

1 Carmen Plaza de Jennings (SBN 091742)
2 Jayne Benz Chipman (SBN 140048)
2 HIRSCHFELD KRAEMER LLP
3 505 Montgomery Street, 13th Floor
3 San Francisco, CA 94111
4 Telephone: (415) 835-9000
4 Facsimile: (415) 834-0443
5 E-mail: cpdjennings@hkemploymentlaw.com
5 jchipman@hkemploymentlaw.com

6 Benjamin K. Lunch (SBN 246015)
7 Wan Yan Ling (SBN 297029)
7 NEYHART, ANDERSON, FLYNN & GROSBOLL
8 369 Pine Street, Suite 800
8 San Francisco, CA 94104
9 Telephone: (415) 677-9440
9 Facsimile: (415) 677-9445
10 E-mail: blunch@neyhartlaw.com
10 wling@neyhartlaw.com

11 **Attorneys for Defendants & Plaintiffs**

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT
14 SAN FRANCISCO DIVISION

16 ELECTRICAL INDUSTRY SERVICE
17 BUREAU, INC.; NORTHERN
17 CALIFORNIA ELECTRICAL
18 WORKERS PENSION TRUST; et al.,

19 Plaintiffs,

20 vs.

21 BEING OF SERVICE, INC., a California
21 corporation; ADVANCED ELECTRIC
22 SOLUTIONS, INC., a California
22 corporation,

23 Defendants.

Case No. 3:13-cv-05810-WHO

**STIPULATION RE: EXTENSION OF
DISCOVERY & ~~PROPOSED~~ ORDER**

Mediator: C. Mark Humbert
Complaint Filed: December 16, 2013
Trial Date: October 13, 2015

24 //

25 //

26 //

27 //

28 STIPULATION RE EXTENSION OF DISCOVERY AND ~~PROPOSED~~ ORDER
CASE NO. 3:13-CV-05810-WHO MED

4851-5337-8339

1 The parties to the above-action hereby submit the following Stipulation regarding the
2 Order issued on January 13, 2015 by the Hon. William H. Orrick.

3 WHEREAS, the parties have engaged in meaningful mediation and settlement efforts with
4 the parties' selected Mediator, C. Mark Humbert; and

5 WHEREAS, the parties believe that continuation of the discovery and other court dates is
6 necessary to facilitate completion of the ongoing mediation process;

7 In light of the foregoing, Plaintiffs ELECTRICAL INDUSTRY SERVICE BUREAU,
8 INC. and NORTHERN CALIFORNIA ELECTRICAL WORKERS PENSION TRUST, et al. and
9 Defendants BEING OF SERVICE, INC., a California Corporation and ADVANCED ELECTRIC
10 SOLUTIONS, INC., a California Corporation, by their undersigned counsel, do hereby stipulate
11 to an order continuing the dates for the pre-trial schedule by sixty (60) days:

12

	Matter	Date as scheduled	Date continued to
14	Discovery cutoff:	May 27, 2015	July 27, 2015
15	Expert disclosure:	April 8, 2015	June 8, 2015
16	Motions heard by:	July 7, 2015	September 8, 2015

17

18 Both parties believe this continuance is in the best interest of all parties in resolving the
19 case.

20

IT IS SO STIPULATED.

21 Respectfully submitted,

22

Dated: April 8, 2015

23 HIRSCHFELD KRAEMER LLP

24


Carmen Plaza de Jennings
Jayne Benz Chipman
Attorneys for Defendants

25

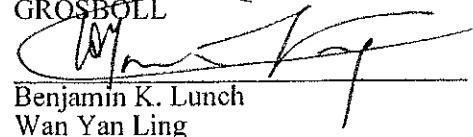
26

27

28

1 Dated: April 8, 2015

NEYHART, ANDERSON, FLYNN &
GROSBOCK

2 
3 Benjamin K. Lunch
4 Wan Yan Ling
5 Attorneys for Plaintiffs

6 IT IS SO ORDERED.

7 IT IS FURTHER ORDERED that the Case Management Conference, currently set for
8 May 12, 2015 at 2:00 p.m. in the above action is hereby continued to August 11, 2015, in
9 Dept. 2 of the U.S. District Court, Northern District of California, San Francisco Division.

10 IT IS FURTHER ORDERED that the Pretrial Conference, currently set for ~~September 14, 2015~~ at 2:00 p.m. in the above action is hereby continued to ~~September 14, 2015~~, in ~~Dept. 2~~ of the U.S. District Court, Northern District of California, San Francisco Division.

11 IT IS FURTHER ORDERED that the trial date, currently set for ~~October 13, 2015~~ at 8:30 a.m. in the above action is hereby continued to ~~October 13, 2015~~, in ~~Dept. 2~~ of the U.S. District Court, Northern District of California, San Francisco Division.

12 Dated: April 20, 2015

13 
14 Hon. William H. Orrick

15

16

17

18

19

20

21

22

23

24

25

26

27

28